

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Kitre Pugh Personally; Kitre Pugh as Personal  
Representative of the Estate of Sylvia Ann Pugh

*(Write the full name of each plaintiff who is filing  
this complaint. If the names of all the plaintiffs  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)*

**-against-**

PennyMac Loan Services, LLC

*(Write the full name of each defendant who is  
being sued. If the names of all the defendants  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)*

**Complaint for a Civil Case**

Case No. \_\_\_\_\_

*(to be filled in by the Clerk's Office)*

Jury Trial: ☒ Yes ☐ No  
*(check one)*

Type text here

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Kitre Pugh
Street Address	700 S Cashua Dr Apt 11A
City and County	Florence
State and Zip Code	South Carolina 29501
Telephone Number	(843)593-5753

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name	PennyMac Loan Services, LLC
Job or Title (if known)	
Street Address	3043 Townsgate Road Suite 200
City and County	Westlake Village, Los Angeles County
State and Zip Code	California 91361
Telephone Number	1(800)777-4001

## Defendant No. 2

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	

Type text here

## Defendant No. 3

Name	
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Job or Title \_\_\_\_\_  
 (if known)  
 Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_  
 Defendant No. 4  
 Name \_\_\_\_\_  
 Job or Title \_\_\_\_\_  
 (if known)  
 Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

12 CFR S 1024.35 (Regulation X-Error Resolution Procedures)  
 12 CFR S 1024.17 (Regulation X-Escrow Account Analysis)  
 12 CFR S 1024.37 (Regulation X-Forced Placed Insurance Protections)  
 12 CFR S 1024.40 (Regulation X-Requirement for SPOC)  
 12 CFR S 1024.41 (Regulation X-Loss Mitigation Procedures)  
 12 CFR S 1024.39 (Regulation X-Early Intervention Requirements)  
 12 CFR S 1024.41(g) (Regulation X- Dual Tracking Prohibition)

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual

The plaintiff, (name) Kitre Pugh, is a citizen of the State of (name) South Carolina.

## b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

## 2. The Defendant(s)

## a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

## b. If the defendant is a corporation

The defendant, (name) PennyMac Loan Services, LLC, is incorporated under the laws of the State of (name) California, and has its principal place of business in the State of (name) California. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

### 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

These violations have caused severe financial hardship and have placed my home at risk of foreclosure on April 1, 2025

These violations have caused severe emotional stress while grieving the loss of a loved one.

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Claim # 1 -PennyMac continued to collect payments after notification of decedent. PennyMac misapplied payments , causing an artificial delinquency that led to unwarranted late fees and default status.

Claim # 2- PennyMac mishandled my escrow account, leading to unjustified increases in my monthly payment

Claim #3- PennyMac has imposed unexplained fees that do not align with my mortgage agreement

Claim #4 -PennyMac improperly force-placed multiple insurance policies, within one calendar year, despite having valid coverage, leading to additional fees, additional financial hardship, and emotional distress

Claim #5- PennyMac failed to assign a single point of contact, making it impossible to receive clear answers regarding my mortgage status leading to severe emotional distress

Claim #6- PennyMac did not inform me of ALL of my Loss Mitigation options without justification

Claim #7- PennyMac has initiated and continued foreclosure proceedings despite my efforts to dispute my loan issues and get Assistance.

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I respectfully request the following actions against PennyMac:

1. Investigate PennyMac's failure to properly apply payments and escrow funds

2. Enforce compliance with the mortgage servicing laws

3. Order PennyMac to provide a written explanation for not providing me with mortgage assistance options and not responding sufficiently to my "Qualified Written Request"

4. Prevent PennyMac from proceeding with foreclosure until my dispute is resolved.

5. Impose penalties for violations of Federal mortgage laws

6. Award compensatory damages as well as punitive damages for emotional distress

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: March 31st, 2025.

Signature of Plaintiff

Type text here

Printed Name of Plaintiff

KITRE PUGH

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address